

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

YOLANDA IRVING, individually and as the natural parent and guardian of J.I., JUWAN HARRINGTON, CYDNEEA HARRINGTON, KENYA WALTON individually and as the natural parent and guardian of R.W., ZIYEL WHITLEY, DYAMOND WHITLEY, KAMISHA WHITLEY, NANETTA GRANT as the natural parent and guardian of Z.G., and EMANCIPATE NC, INC.,

Plaintiffs,

v.

THE CITY OF RALEIGH, Officer OMAR I. ABDULLAH, Sergeant WILLIAM ROLFE, Officer RISHAR PIERRE MONROE, Officer JULIEN DAVID RATTELADE, Officer MEGHAN CAROLINE GAY, Officer DAVID MEAD, Officer JESUS ORTIZ, Officer KYLE PERRIN, Officer MICHEAL MOLLERE, Officer KYLE THOMPSON, Officer VINCENT DEBONIS, Officer DANIEL TWIDDY, Officer THOMAS WEBB, Officer DAVID MCDONALD, Officer DAVID GARNER, Chief of Police ESTELLA PATTERSON and City Manager MARCHELL ADAMS-DAVID, in their official capacities,

Defendants.

5:22:CV-0068-BO

**MOTION FOR CONSENT PROTECTIVE ORDER REGARDING  
STATE BUREAU OF INVESTIGATION FILE**

Plaintiffs, through counsel, move the Court to enter the proposed consent Protective Order allowing release of SBI Investigative File No. 2020-2929, regarding the SBI investigation into the conduct of Officer Omar I. Abdullah and Dennis Leon Williams that is the subject of this lawsuit.

As laid out in the proposed protective order, counsel for the Parties and counsel for the SBI stipulate to the terms of the proposed Protective Order governing the handling and disclosure of SBI Report, File No. 2020-2929, and all materials contained within the SBI Report. Counsel for the SBI, after reviewing this file and related documents, has determined that the SBI has no objection to producing the SBI Report.

Respectfully,

/s/ Abraham Rubert-Schewel

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